



**NATIONAL
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ASSOCIATION**

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March 17, 2008

U.S. Department of the Interior
Minerals Management Service
381 Elden Street
Mail Stop 4024
Herndon, VA 20170-4817

VIA FAX: 703-787-1546

VIA email: rules.comments@mms.gov

ATTN: Rules Processing Team (Comments)
RIN 1010-AD11

Re: Sub Part J - Pipelines and Pipeline Rights-of-Way (72 Fed. Reg.
56442, October 3, 2007).

Dear Sir or Madam:

The National Ocean Industries Association (NOIA) appreciates the opportunity to provide comments on the proposed rule concerning pipelines and pipeline rights-of-way. NOIA is the only national trade association representing all segments of the offshore energy industry. The NOIA membership comprises more than 300 companies engaged in activities ranging from drilling to producing, engineering to marine and air transport, offshore construction to equipment manufacture and supply, shipyards to communications, and geophysical surveying to diving operations. The regulation of offshore pipelines is, therefore, of particular importance to us.

NOIA was grateful that the Minerals Management Service (MMS) extended the comment period and conducted a workshop on February 22, 2008. These two actions allowed our member companies to devote a substantial amount of time to reviewing and analyzing the proposed rule so that they could provide constructive feedback to the agency.

NOIA commends the MMS for its efforts to revise and clarify its pipeline regulations. We appreciate the need for regulations to improve safety and environmental performance, and support reasonable regulations that achieve those goals. However, we are concerned that the proposed rule will not achieve the agency's stated intent,

and that will instead have a negative impact on offshore energy development.

NOIA also differs with the agency's assertion that this rule is not a significant rule within Executive Order 12866. We believe that the MMS vastly underestimates the costs the rule would impose on our industry. Furthermore, we believe that the rule would lengthen the permitting approval process, create numerous duplicative inspection and record keeping requirements, and conflict with existing Department of Transportation requirements.

NOIA has worked jointly with the Offshore Operators Committee (OOC) in its review and analysis of the proposed rule. We support the recommendations that have been submitted by the OOC, and request that the MMS fully consider those recommendations.

Thank you for the opportunity to comment on the proposed rule. If you have any questions or need additional information, please contact Kim Harb at (202) 737-0926.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kim Harb', with a stylized flourish at the end.

Kim Harb